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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KRISHAN LAL, KULDIP KAUR,)
KANCHAN PAUL, and RANJANA PAUL,)

Plaintiffs,)

vs.)

MARINA LONG, CORPORATION OF)
THE PRESIDENT OF THE CHURCH OF)
JESUS CHRIST OF LATTER-DAY)
SAINTS, CORPORATION OF THE)
PRESIDING BISHOP OF THE CHURCH)
OF JESUS CHRIST OF LATTER DAY)
SAINTS, DOES I through X, inclusive; and)
ROE CORPORATIONS I through X,)
inclusive,)

Defendants.)

Case No. 2:15-cv-00658-JCM-GWF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES
IN THE DISCOVERY PLAN AND
SCHEDULING ORDER**

First Request

Defendants Corporation of the President of The Church of Jesus Christ of Latter-day Saints
("COP") and Corporation of the Presiding Bishop of The Church of Jesus Christ of Latter-day Saints
("CPB"), through the law firm Carbajal & McNutt LLP, Plaintiffs Krishan Lal, Kuldip Kaur,
Kanchan Paul, and Ranjana Paul (collectively, "Plaintiffs"), through the law firm Craig P. Kenny &

Associates, Defendant Marina Long, through the law firm Kolesar & Leatham, and Plaintiff / Counter-Defendant Krishan Lal, through the Harper Law Group, hereby stipulate and agree pursuant to LR 26-4 to extend the deadlines in the May 7, 2015 Discovery Plan and Scheduling Order, ECF No. 15.

I. CURRENT DEADLINES.

The following are the deadlines in the current Discovery Plan and Scheduling Order:

CURRENT DEADLINE	EVENT
07/14/15	Deadline to Amend the Pleadings and Add Parties
08/13/15	Deadline for Initial Expert Disclosures
08/13/15	Deadline for the Interim Status Report
09/14/15	Deadline for Rebuttal Expert Disclosures
10/12/15	Discovery Deadline
11/11/15	Deadline for Dispositive Motions
12/11/15	Deadline for the Joint Pretrial Order

II. DISCOVERY CONDUCTED TO DATE.

To date, the parties have disclosed witnesses and documents under Rule 26. CPB has served first sets of interrogatories and requests for production upon Plaintiffs. Defendants are also in the process of obtaining Plaintiffs' medical records from their providers.

III. DESCRIPTION OF THE REMAINING DISCOVERY.

The Parties wish to serve additional written discovery, serve additional subpoenas duces tecum upon nonparties, depose nonparty witnesses, depose the Parties, disclose experts, and depose experts.

IV. REASONS FOR EXTENDING THE DEADLINES.

LR 26-4 states "[a]pplications to extend any date set by the discovery plan . . . must . . . be

supported by a showing of good cause for the extension.” “Good cause” exists if, notwithstanding its diligence, a party cannot reasonably comply with the current discovery deadlines.¹

This personal injury case arises from an automobile accident. Plaintiffs Krishan Lal and Kuldip Kaur are continuing to receive medical treatment and have been recommended for operations. They are currently deciding whether to undergo the operations. Defendants wish to hold off on conducting independent medical examinations (IMEs) and deposing these plaintiffs until after they undergo any future operations. This will allow the IME experts to examine these plaintiffs in their post-operative conditions, as well as allow Defendants to question these plaintiffs at their depositions about any post-operative complications and care. These IMEs and depositions must be conducted prior to any initial expert disclosures. For these reasons, the parties wish to extend the discovery deadlines by two months.

IV. PROPOSED EXTENDED DEADLINES.

The Parties propose extending the following deadlines by two months:

CURRENT DEADLINE	PROPOSED EXTENDED DEADLINE	EVENT
10/12/15	12/14/15	Discovery Deadline
07/14/15	09/14/15	Deadline to Amend the Pleadings and Add Parties
08/13/15	10/13/15	Deadline for Initial Expert Disclosures
09/14/15	11/13/15	Deadline for Rebuttal Expert Disclosures
08/13/15	10/13/15	Deadline for the Interim Status Report
11/11/15	12/11/15	Deadline for Dispositive Motions

¹ *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992) (defining “good cause” under FRCP 16(b); *see also McKellip v. Las Vegas Metro. Police Dep’t*, No. 2:05CV00897-BES-GWF, 2007 WL 173857, at *2, n.2 (D. Nev. Jan. 17, 2007) (the definition of “good cause” under FRCP 16 is consistent with LR 26-4.)

12/11/15	01/11/16	Deadline for the Joint Pretrial Order
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IT IS SO STIPULATED this 25th day of June, 2015.

CARBAJAL & MCNUTT, LLP

KOLESAR & LEATHAM

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Attorneys for Defendant *Marina Long*

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Attorneys for *Plaintiffs*

Attorney for *Counter-Defendant Krishan Lal*

IT IS SO ORDERED:



 GEORGE FOLEY, JR.

United States Magistrate Judge

DATED: June 26, 2015

12/11/15	01/11/16	Deadline for the Joint Pretrial Order
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IT IS SO STIPULATED this 24th day of June, 2015.

CARBAJAL & MCNUTT, LLP

KOLESAR & LEATHAM

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Attorneys for *Plaintiffs*

Attorney for *Counter-Defendant Krishan Lal*

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____